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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)	
)	Case No. 3:03-cr-00088-RRB-4
Plaintiff,)	
)	
v.)	MOTION FOR PERMISSION TO
)	LEAVE STATE FOR A FUNERAL:
IRIS BINGHAM,)	FILED ON SHORTENED TIME
)	
Defendant.)	
_____)	

COMES NOW the Defendant, Iris Bingham, by and through her attorney, Randall S. Cavanaugh of KALAMARIDES & LAMBERT, and hereby moves this court for permission to attend her brother's funeral. Her brother, Samuel Bingham was in the military and he was struck by a vehicle while riding his motorcycle. The funeral will be in Ogden, Utah. Ms. Bingham's parents are paying for the airline ticket. Ms. Bingham would be leaving as soon as possible for the funeral on Saturday, May 20, 2006. Ms. Bingham would be with her parents and return on May 22, 2006 to Anchorage,

Alaska. Ms. Bingham's mother's cell-phone number is 907/723-1244. It is believed that Ms. Bingham has two months left on ankle monitor.

Ms. Bingham stated that her probation officer, Ms. Mader, indicated that she needed the court's permission for her to travel out of state for the funeral. Mr. Crandon Randall is currently trying a case down on the Kenai Peninsula.

DATED this 16th day of May, 2006, at Anchorage, Alaska.

KALAMARIDES & LAMBERT
Attorneys for Defendant

By: /s/ Randall S. Cavanaugh
Randall S. Cavanaugh, ABA #8812215
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CERTIFICATE OF SERVICE

The undersigned hereby certifies, pursuant to App. R. 513.5, that the font used in the aforementioned documents was Times New Roman 13 point. I further certify that a true and correct copy of the foregoing was served via **electronic mail** this 16th day of May, 2006, on:

Assistant U.S. Attorney
Federal Building & U.S. Courthouse
222 West 7th Avenue, #9, Room 253
Anchorage, AK 99513

/s/ Randall S. Cavanaugh
Kamarides & Lambert